

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

---

**MICHAEL J. BELLEAU,  
Plaintiff,**

v.

**Case No. 12-CV-1198 (WCG)**

**EDWARD F. WALL, et. al.,  
Defendants.**

---

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

---

Pursuant to Fed. R. Civ. P. 26(c), Plaintiff Michael Belleau and Defendants Edward Wall and Denise Symdon respectfully request that this Court enter the attached Stipulation and Protective Order. In support thereof, the parties state as follows:

1. In the course of discovery, the parties anticipate requesting documents and other responses to discovery that are likely to include sensitive information from the Department of Corrections' policies and procedures regarding the implementation or execution of global position system tracking devices.
2. Plaintiff and Defendants respectfully request that certain restrictions be imposed by the Court on the parties' use of confidential information as set forth in the proposed protective order.

WHEREFORE, Plaintiff and Defendants request that the Court enter the attached Stipulation and Protective Order and order such further relief as the Court deems equitable and just.

Dated this 26th day of June 2014.

Respectfully submitted,

/s Abigail C.S. Potts  
Abigail C.S. Potts  
Wisconsin Bar No. 1060762  
Assistant Attorney General  
Wisconsin Department of Justice  
P.O. Box 7857  
Madison, WI 53707-7857  
Telephone: (608) 267-7292  
Fax: (608) 267-8906  
Email: pottzac@doj.state.wi.us

/s Anthony D. Russomanno  
Anthony D. Russomanno  
Wisconsin Bar No. 1076050  
Assistant Attorney General  
Wisconsin Department of Justice  
P.O. Box 7857  
Madison, WI 53707-7857  
Telephone: (608) 267-2238  
Fax: (608) 267-8906  
Email: russomannoad@doj.state.wi.us

*Attorneys for Defendants*

/s Laurence J. Dupuis  
Laurence J. Dupuis  
Wisconsin Bar No. 1029261  
AMERICAN CIVIL LIBERTIES UNION  
OF WISCONSIN FOUNDATION, INC.  
207 East Buffalo Street, Suite 325  
Milwaukee, WI 53202-5712  
Telephone: (414) 272-4032, ext. 12  
Fax: (414) 272-0182  
Email: ldupuis@aclu-wi.org

/s James A. Walrath  
James A. Walrath  
Wisconsin Bar No. 1012151  
LAW OFFICES OF JAMES A. WALRATH, LLC.  
324 E. Wisconsin Ave., #1410  
Milwaukee, WI 53202  
Telephone: (414) 202-2300

Email: jw@jaw-law.com

*Attorneys for Plaintiff*